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January 14, 1994

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CARL W. NORTHROP

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: Notice of *Ex Parte* Contact
GEN Docket No. 90-314; 92-100

Dear Mr. Caton:

On January 13, 1994, Charlie Jackson, Mark Stachiw, Kathleen Abernathy and Carl W. Northrop, representatives of Pactel Paging ("Pactel"), met with Thomas Stanley in the Office of Engineering and Technology to discuss Narrowband PCS. The discussions were consistent with Pactel Paging's publicly filed comments.

Please include a copy of this notice of ex parte contact in the records of the above-referenced proceeding, along with the attached copies of the written materials presented, in accordance with the Commission's rules.

Very truly yours,


Carl W. Northrop

cc: Thomas Stanley

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FEDERAL COMMUNICATIONS COMMISSION
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NARROWBAND PCS

A CASE FOR LARGER GEOGRAPHIC LICENSING AREAS

PRESENTATION TO OFFICE OF ENGINEERING AND TECHNOLOGY

JANUARY 13, 1994

**PACTEL PAGING
JANUARY 13, 1994**

- **BTA AREAS FOR NARROWBAND PCS ARE TOO SMALL AND DO NOT SERVE THE PUBLIC INTEREST**
 - **THE BTAS IN SOME CASES ARE SO SMALL THAT A REGULAR TRANSMITTER PLACED IN THE CENTER WOULD SPILL OVER TO ADJACENT AREAS**
 - **THE SIZE OF THE AREAS AND THEIR RELATIVE POPULATION WOULD DICTATE THAT MANY MAY NOT BE SERVED BECAUSE OF THE LOW POPULATION; THUS THE AUCTION WILL BRING IN LITTLE REVENUE FOR MOST BTAS**
 - **THE COMPETITION TO NARROWBAND PCS SERVICES COMES FROM EXISTING PAGING SERVICE WHICH IN MANY CASES COVER 18-30 BTA AREAS; THUS, A LICENSEE OF A SINGLE BTA COULD FRUSTRATE ANOTHER'S ABILITY TO BUILD WIDE-AREA SYSTEMS**
- **THE FOLLOWING PAGES SHOW THE BREAKDOWN OF PROPOSED LICENSING AREAS IN TWO STATES CALIFORNIA AND TEXAS**
 - **ALSO INCLUDED IS A EXAMPLE OF HOW THE BTA AREA MAKES FOR SMALL POPULATION AREAS IN MIDSIZE CITIES, SUCH AS STOCKTON AND TYLER**

- **MTA LICENSING FOR NARROWBAND PCS DOES NOT SERVE THE PUBLIC INTEREST**
 - **MANY CURRENT PAGING SYSTEMS, WHICH WILL BE DIRECT COMPETITORS FOR THE NEW SYSTEMS, ALREADY ARE LICENSING IN GEOGRAPHICAL AREAS LARGER THAN MTAS, IN MANY CASES MULTISTATE**
 - **THE ANALYSIS ON THE FOLLOWING PAGES SHOWS THAT MTAS ARE SMALLER THAN CURRENT SYSTEMS AND WOULD REPRESENT THE COMMISSION MERELY FOLLOWING THE INDUSTRY, AS OPPOSED TO LEADING IT.**
 - **THERE IS A PROBLEM THAT A WINNER IN ONE MTA MAY NOT BE LICENSED ON THE SAME FREQUENCY IN AN ADJACENT AREA, THEREBY POTENTIALLY THWARTING GEOGRAPHIC AGGREGATION**
 - **THE PUBLIC INTEREST WOULD BEST BE SERVED BY GRANTING THESE LICENSES IN A SUFFICIENTLY LARGE GEOGRAPHIC AREA THAT WOULD PERMIT A LICENSEE TO HAVE A VIABLE MARKET AREA WITHOUT BEING REQUIRED TO PURCHASE ADDITIONAL LICENSES**
- **PACTEL, THEREFORE, RESPECTFULLY RECOMMENDS THAT THE COMMISSION:**
 - **ADOPT THE TELOCATOR LICENSING AREAS FOR ALL CHANNELS OTHER THAN THE 12.5 KHZ UNPAIRED MOBILE-TO-BASE CHANNELS**
 - **ADOPT MTAS AS THE LICENSING AREA FOR 12.5 KHZ UNPAIRED MOBILE-TO-BASE CHANNELS**

**BENEFITS OF THE
FIVE REGION PLAN**

- **FEWER AUCTIONS REQUIRED, RESULTING IN QUICKER LICENSING**
- **COMPETITIVE PARITY TO**
 - **EXISTING WIDE-AREA SYSTEMS**
 - **12 STATE PCP REGIONS**
- **AVOIDS THE RAND-McNALLY CLAIMS OF PROPRIETARY RIGHTS IN MTA/BTA DESIGNATIONS**
- **SUPPORTS/ENCOURAGES INDUSTRY CONSENSUS**

California

License Area	Number of Areas	Population of area containing Stockton, CA	Notes
Metropolitan Statistical Areas (MSA) and Rural Service Areas (RSA)	28	490,000	Smaller areas, rural areas associated with MSAs are separately licensed
Basic Trading Area (BTA)	18	523,000	Several BTAs are less than 30 miles across
BEA Economic Areas	9	1,186,200	Combines BTAs into larger areas, still anomalies, such as Sacramento-Stockton
Major Trading Areas (MTA)	2	12,000,000	Allows for greatest freedom to construct a system which meets market demand
Current Major Paging Systems	1	30,353,000	Entire state of California service ¹
Telocator Proposed Areas	1	50,400,000	5 of these nationwide

¹ Currently, paging systems are licensed on a per transmitter basis. The system coverage results from putting all the transmitters coverage area together.

Texas

License Area	Number of Areas	Population of area containing Tyler, TX	Notes
Metropolitan Statistical Area (MSA) and Rural Service Areas (RSA)	45	152,000	Does not include rural areas which were classified into RSAs for cellular
Basic Trading Area (BTA)	29	272,000	Some BTAs less than 20 miles across
BEA Economic Areas	15	778,200	Combines BTAs into larger areas, still anomalies, such as Beaumont-Houston
Major Trading Areas (MTA)	4	4,085,000	Allows for greatest freedom to construct a system which meets market demand
Current Major Paging Systems	1	17,167,000	Entire state of Texas service
Telocator Proposed Areas	1	28,408,000	